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Sharla Dillon, Docket Manager
Tennessee Regulatory Authority
460 James Robertson Parkway
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Re: Coalition of Small Lec's
Docket Nos 03-00585

Dear Ms. Dillon:

Enclosed is an original and fifteen copies of the Coalition's Responses to the Supplemental Interrogatories of the CMRS Providers and Attachment 1 to the Responses. Due to its volume, I have only enclosed one copy of Attachment 2 to the Responses. The information contained in Attachment 2 is public information and available from the FCC's website. If Hearing Officer Stone wishes, I can email an electronic version of Attachment 2 to her but it will, by necessity, have to be broken up into several emails. I have only served electronic copies (and not paper copies) of Attachment 2 on CMRS Providers.

Thank you for your assistance.

Sincerely,

Bill Ramsey
William T. Ramsey

/jm
enclosures

cc: Hearing Officer Jean Stone
All Counsel of Record

LATE FILED

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

IN RE:

| | | |
|--|----------|----------------------------|
| Generic Docket Addressing Rural Universal Service |) | Docket No. 00-00523 |
| |) | |
| Petition of Cellco Partnership d/b/a Verizon Wireless |) | Docket No. 03-00585 |
| for Arbitration under the Telecommunications Act |) | |

**RESPONSE OF THE RURAL COALITION OF SMALL LECs
AND COOPERATIVES TO THE SUPPLEMENTAL
INTERROGATORIES OF THE CMRS PROVIDERS**

on behalf of

**Ardmore Telephone Company, Inc.
Ben Lomand Rural Telephone Cooperative, Inc.
Bledsoe Telephone Cooperative
CenturyTel of Adamsville, Inc.
CenturyTel of Claiborne, Inc.
CenturyTel of Ooltewah-Collegedale, Inc.
Concord Telephone Exchange, Inc.
Crockett Telephone Company, Inc.
DeKalb Telephone Cooperative, Inc.
Highland Telephone Cooperative, Inc.
Humphreys County Telephone Company
Loretto Telephone Company, Inc.
Millington Telephone Company, Inc.
North Central Telephone Cooperative, Inc.
Peoples Telephone Company
Tellico Telephone Company, Inc.
Tennessee Telephone Company
Twin Lakes Telephone Cooperative Corporation
United Telephone Company
West Tennessee Telephone Company, Inc.
Yorkville Telephone Cooperative**

"The Coalition of Small LECs and Cooperatives"

RESPONSES TO SUPPLEMENTAL INTERROGATORIES

1. If any ICO has established its own tandem, or subtends a non-ICO tandem provider other than BellSouth, does any connection remain between a BellSouth tandem and the ICO's end office or tandem switch(es), or the non-ICO tandem to which ICO's network is also connected? If the answer is "Yes", please identify on an ICO-specific basis:

- A. By CLLI Code, the connected BellSouth tandem, ICO end office or tandem switch(es), and any non-ICO tandem switch.
- B. The type(s) of traffic being exchanged between the identified BellSouth tandem and the ICO's network.

Response:

ICO specific information is provided in Attachment 1. Irrespective of whether an ICO has established its own tandem, BellSouth maintains physical connectivity with each ICO. Where EAS exists between the ICO and BellSouth, EAS traffic is exchanged over connecting EAS trunks. A physical connection is also maintained for the origination and termination of intraLATA toll traffic used for BellSouth's provision of intrastate, intraLATA interexchange carrier services. Although the ICOs have not authorized BellSouth to interconnect any other traffic over the existing physical interconnection, it is the understanding of the ICOs, as indicated in prior responses, that BellSouth had offered and provided intraLATA wide transport and termination services to CLECs and CMRS providers and uses the physical connection to terminate this traffic. Where the ICO has its own tandem, it

is the ICO's expectation that no third party carriers should interconnect traffic to the ICO through BellSouth.

2(a) On page 35 of Mr. Watkins' testimony in response to the first question is the following statement: "... [T]he so-called economic and incremental costing methodology that the FCC applies to companies like BellSouth does not apply to the smaller rural carriers." Please provide the basis ie; any regulation, statute, order or judicial decision, on which this statement is based.

Response: This interrogatory is not one that seeks factual information. The CMRS Providers apparently seek legal research and analysis. This request raises issues regarding good-faith in the negotiation process and the ICOs reserve all related rights. Notwithstanding this objection and reservation of rights, the Coalition offers the following information. On any occasion where the FCC has considered the imposition of "economic and incremental costing methodology on rural telephone companies, the FCC has concluded that no such requirement exists. For example, in the *First Report and Order* in CC Docket 96-98 the FCC stated at para. 1059 in the context of discussing these pricing rules:

We also note that certain incumbent LECs are not subject to our rules under section 251(f)(1) of the 1996 Act, unless otherwise determined by a state commission, and certain other small incumbent LECs may seek relief from their state commissions from our rules under section 251(f)(2) of the 1996 Act.

No requirement or standard exists with respect to the use of incremental or forward-looking pricing by the Rural Telephone Companies. The opposite exists – the FCC has recognized that it should refrain from imposing this methodology on rural companies. While the FCC may in the future impose a forward-looking cost

methodology on rural telephone companies, the fact that it does not require rural companies to utilize this methodology was most recently discussed in an Order released on June 28, 2004 in CC Docket No, 96-45 (*see, e.g.*, paras. 4-6). The information requested by the CMRS Providers in this Interrogatory is a matter of law and public record that should be well known to any telecommunications carrier seeking any interconnection service from a rural telephone company in good faith.

2(b) Is any ICO relying upon the Rural Telephone Company Exemption, pursuant to Section 251(f) of the Telecommunications Act, to support Mr. Watkins' statement?

Response: Mr. Watkins' statement relies in part on Section 251(f) as reflected by the citation provided in response 2(a). The FCC has on many occasions indicated that it refrains from imposing forward-looking cost methodology on any incumbent rate of return regulated LEC irrespective of whether that LEC is a rural telephone company subject to the exemption established by Section 251(f)(1) of the Telecommunications Act.

2(c) List each ICO answering "yes" to question 2(b).

Response: Each of the member of the Coalition is a Rural Telephone Company and, therefore, subject to the exemption established by Section 251(f)(1). Accordingly, all Coalition Members respond "Yes."

3. In paragraph two of Mr. Watkins answer to the first question on page 35, the statement is made: “Moreover, the fact is that their actual costs (no matter what theoretical approach one applies) are likely to be much higher than these rates would indicate for at least two reasons: (1) the FCC has removed some actual traffic sensitive costs from interstate access rates; and (2) not all the ICOs actual costs are even considered in the development of these rates because some of those costs are assigned and recovered through Universal Service sources.” Please provide the following:

a. Identify “actual traffic sensitive costs” that the FCC has removed from interstate access rates. Cite the source for this assertion.

Response: The “actual traffic sensitive costs removed from interstate” traffic sensitive access rates are set forth in section 69.415 of the FCC Rules and Regulations (47 CFC Sec. 69.415). The rule reallocating these transport expenses was established by an Order issued by the FCC on November 8, 2001 in CC Docket Nos. 00-256, 96-45, 98-77, and 98-166.

b. Identify the “ICOs actual costs” that are not considered in the development of these rates because those costs are assigned and recovered through the Universal Service sources. Cite the source for this assertion.

Response: The costs recovered through Universal Service mechanisms are set forth in the supporting source, 47 CFR Sec. 51.301

4. Please indicate whether each of the Rural Coalition companies is an “Average Schedule Company” for purposes of interstate access rates.

Response: See Attachment 1.

5. Please provide references/citations to the NECA filings that “are a matter of public record” and on which the ICO rates in Attachment E to Mr. Watkins' testimony are based. The references/citations should be adequate to enable the basis for each company's rates to be determined.

Response: Without waiving rights regarding admissibility and relevance, those Coalition members that are required to perform cost studies for submission to NECA have offered to provide the CMRS Providers with copies of those studies. NECA incorporates these studies into the development of its tariff rate filings and cost support information. The annual NECA tariff filings are readily available from both the FCC and the NECA web sites. The most recent NECA annual tariff filing, for example can be found at http://www.neca.org/source/NECA_150_1207.asp. Cost support information filed by NECA that was used to derive the rates offered by the ICOs in the context of a voluntary negotiation is available on the FCC web-site. Examples of this information are provided in Attachment 2.

6. Please list the “access function elements” included in each ICO's rates contained in Attachment E to Mr. Watkins' testimony. Indicate whether Mr. Watkins considers each of these access function or rate elements to be included in the definition of “transport” and “termination” as defined in 47 CFR 51.701 (c) and (d).

Response: The access function elements referenced by Mr. Watkins do parallel those addressed in 47 CFR 51.701(c) and (d), notwithstanding the fact that this section of the rules is not applicable to the indirect interconnection arrangement under consideration in this proceeding. These access function elements include: tandem-switched transport and tandem charge, local switching, and transport.

7. Please produce the data, cost models, and all support, including any relevant citations to public records, which support rates or the assumptions upon which the rates in Exhibit E are based.

Response 7: See Attachment 2. This and additional related information is available from the FCC's web site.

8. Please identify whether ICO offers "call forwarding" and / or "foreign exchange service" to its customers and if, so

a. Whether the ICO places any geographic restriction on the locations to which calls can be forwarded and/or foreign exchange service established; and

b. What percentage of traffic received by the ICO is forwarded or sent to a foreign exchange.

Response: See Attachment 1 for individual ICO responses wherein the ICOs have provided in good faith their response based on their understanding of the use of the term "foreign exchange service" by the CMRS Providers.

9. Provide citations for the statement in first paragraph of page 44 of Mr. Watkins' testimony that "...the Courts and FCC have concluded that LECs may treat as toll calls any call to a mobile user that must be delivered to an interconnection point beyond the normal local calling area regardless of the NPA-NXX..."

Response: See, e.g., Memorandum Opinion and Order, In the Matters of TSR Wireless, LLC, et al., Complainants, v. US West Communications, Inc. et al., Defendants, released June 21, 2000, in File Nos. E-98-13, E-98-15, E-98-16, E-98-17, E-98-18 ("TSR Order") at para. 31, affirmed Qwest Corporation v. FCC, 252 F.3d

462 (D.C. Cir. 2001); *Mountain Communications, Inc. v. Qwest Communications*, FCC 02-220, Order on Review, July 25, 2002, para 6. *vacated in part and remanded*, 355 F.3d 644 wherein the Court of Appeals recognized that LECs may treat as toll calls any call to a mobile user that must be delivered to an interconnection point beyond the normal local calling area regardless of the NPA-NXX. 355 F. 3d at 647.

10. Provide citations for the statement on page 45 of Mr. Watkins' testimony that "...the FCC has concluded that NPA-NXX information is generally meaningless with respect to wireless service."

Response: *In the Matter of Telephone Number Portability*, CC Docket No. 95-116, released October 7, 2003, para 22. ("Because wireless service is spectrum-based and mobile in nature, wireless carriers do not utilize or depend on the wireline rate center structure to provide service: wireless licensing and service areas are typically much larger than wireline rate center boundaries, and wireless carriers typically charge their subscribers based on minutes of use rather than location or distance." (Underscoring added).

11. On page 29 of Mr. Watkins' testimony, he contends that "when BellSouth co-mingles the third party traffic with other access traffic, the ICOs do not have technically feasible methods to identify, measure, or switch, on a real-time basis, traffic based on whether the call has been originated by one of the CMRS providers." Please answer the following questions regarding this statement:

A. Do the ICOs have the ability to identify or measure co-mingled traffic on something other than a "real time basis" and if so what basis? Can the ICOs

measure or identify traffic sent over those trunks groups by carriers other than the CMRS providers (e.g. BellSouth, CLECs, IXC's etc.)?

Response 11 A: ICOs would prefer to measure all terminating traffic; the use of the common trunk group precludes them from doing so. ICOs can generally measure the total traffic sent over the trunk. See Attachment 1 for individual ICO responses.

B. Can the ICOs measure or identify traffic sent over those trunks groups by carriers other than the CMRS providers (e.g. BellSouth, CLECs, IXC's etc.)?

Response 11 B: ICOs would prefer to measure all terminating traffic; the use of the common trunk group precludes them from doing so. ICOs can generally measure the total traffic sent over the trunk. See Attachment 1 for individual ICO responses.

C. Has any ICO ever billed any CMRS or CLEC carrier for termination of traffic that was indirectly delivered to ICO via a BellSouth tandem? If the answer is "Yes", please state on an ICO-specific basis.

a. Each CMRS or CLEC carrier that ICO has billed.

b. The date ICO commenced billing each CMRS or CLEC carrier that it has billed.

c. How did ICO identify the volume of traffic for which it has billed each CMRS or CLEC carrier

Response 11 C. See Attachment 1.

D. Is there a difference in the ICOs' ability to identify, measure and bill traffic that is co-mingled over Feature Group C trunks and traffic that is co-mingled over Feature Group D trunks? If so please explain.

Response 11 D: The distinctions between Feature Groups C and D are thoroughly set forth in NECA Tariff No. 5, Sections 6.7 and 6.8. The tariff can be viewed online at <http://www.neca.org/media/tariff5>. Traffic terminating through a Feature Group D trunk should contain originating carrier identification information that is not available with respect to traffic terminated on a Feature Group C interconnection arrangement.

12. Who do the ICOs contend is responsible for measuring and billing for traffic terminated on its network?

Response 12: The ICOS would prefer to measure traffic terminated on their networks and to bill the carrier that interconnects traffic that is terminated on their respective networks. The ICOs contend that when a carrier delivers traffic through a Feature Group C interconnection, that carrier (i.e., the carrier physically delivering the traffic to the ICO) is responsible for payment of associated interconnection charges. Under this circumstance, the ICOs are able to measure the traffic terminated by the physically connecting carrier and bill that carrier.

Respectfully submitted,

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July 6, 2004

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the foregoing has been served on the parties of record indicated below via U.S. Mail and via electronic mail on this the 6th day of July, 2004.

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Ardmore Telephone Company

1. Ardmore Telephone Company has a connection with the IRIS tandem in Nashville and the BellSouth tandem in Nashville.
 - a. ARMRALXADSO NSVLTNMTDSO (BellSouth)
ARMRALXADSO NSVNTNGNOOT (IRIS)
 - b. 1+, 0+, wireline, wireless, CLEC
4. Ardmore Telephone Company is a "Cost Schedule Company" for purposes of interstate access rates
8. Ardmore Telephone Company does offer call forwarding to our customers but does not offer foreign exchange service.
 - a. Ardmore Telephone Company does not place any geographic restriction on the locations to which calls can be forwarded.
 - b. The percentage of traffic forwarded to unknown.
11.
 - a. Ardmore Telephone Company does not have the ability to identify or measure traffic originated by a CMRS provider on a real-time basis but in most cases, BellSouth provides this in the EMR 11-01-01 record.
 - b. Same as 11a
 - c. Ardmore Telephone Company has not billed any CMRS or CLEC carrier for termination of traffic that was indirectly delivered via a BellSouth tandem.

Ben Lomand Rural Telephone Cooperative, Inc.

1(a). Ben Lomand Rural Telephone Cooperative, Inc. has its own tandem. We also have a Feature Group C connection to the Bellsouth lata tandem, NSVLTNXA84T. In addition, we have a Feature Group D connection to the Iris tandem, NSVLTNNGN00T. Some carriers have direct two-way trunks to the

MMRLTNXA94T tandem.

1(b). Feature Group C between Bellsouth NSVLTNXA84T and McMinnville Rural tandem MMRLTNXA94T.

4. Ben Lomand Rural Telephone Cooperative, Inc. is an average schedule company.

8(a). Ben Lomand Rural Telephone Cooperative, Inc. provides call forwarding and FX service. If a telephone number is forwarded outside its rate center, calls to that number are forwarded as a toll call to the forwarded number.

Foreign exchange service can be requested from any area. The local calls are restricted to the appropriate rate center for the foreign exchange.

8(b). We have no records to determine what is forwarded or sent to a foreign exchange.

11(a). No, we do not have the ability to identify or measure co-mingled traffic.

11(b). We cannot identify whose traffic it is on a common trunk group other than who the trunk belongs to.

11(c) We have billed no one for indirectly terminated traffic.

Ben Lomand Rural Telephone Cooperative, Inc.

1(a). Ben Lomand Rural Telephone Cooperative, Inc. has its own tandem. We also have a Feature Group C connection to the Bellsouth lata tandem, NSVLTNXA84T. In addition, we have a Feature Group D connection to the Iris tandem, NSVLTNGN00T. Some carriers have direct two-way trunks to the MMRLTNXA94T tandem.

1(b). Feature Group C between Bellsouth NSVLTNXA84T and McMinnville Rural tandem MMRLTNXA94T.

4. Ben Lomand Rural Telephone Cooperative, Inc. is an average schedule company.

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11(a). No, we do not have the ability to identify or measure co-mingled traffic.

11(b). We cannot identify whose traffic it is on a common trunk group other than who the trunk belongs to.

11(c). We have billed no one for indirectly terminated traffic.

Bledsoe Telephone Company

| Question | Answer |
|----------------------|--|
| Question #1 | Yes |
| Question #1A and #1B | See table below for end offices, tandems, and types of traffic |

| CLLI Code | Name | Traffic Type |
|-------------|--|---|
| PKVLTNXADSO | Pikeville End Office | All originating and terminating local and toll calls directed to and from this NPA-NXX flow through this stand-alone end office |
| NNMLTNXADSO | Nine Mile End Office | All originating and terminating local and toll calls directed to and from this NPA-NXX flow through this stand-alone end office |
| CLSTTNXADSO | College Station End Office | All originating and terminating local and toll calls directed to and from this NPA-NXX flow through this stand-alone end office |
| FCFLTNXADSO | Fall Creek Falls End Office | All originating and terminating local and toll calls directed to and from this NPA-NXX flow through this stand-alone end office |
| DNLPTNXADSO | Dunlap End Office | All originating and terminating local and toll calls directed to and from this NPA-NXX flow through this stand-alone end office |
| PKVLTNXADSO | Pikeville Access Tandem (GB Office Code) | All originating and terminating toll calls from each end office are collocated onto our Class 4 tandem and sent via common trunks to BellSouth for Intralata, 800, and OPH and iRIS for interlata calls |
| CHTGTNNS90T | BellSouth EAS Tandem | EAS calls from and to our end offices are directed through EAS trunks to this tandem |
| NSVNTNGN00T | iRIS (Non-ICO) Tandem (effective 9/3/03) | Each Interlata IXC and all non-Bell Intralata IXCs are tandemmed to iRIS for the following type calls Org/Term International 01+/011+ |

Term International OS
Org/Term 1+ Interlata FGD
Org/Term 101XXXX Interlata FGD
Org/Term Intralata IXC Pic'd Traffic
Org/Term Pre-Queried 800
Org/Term 1-900

Bledsoe page 2/2

Question #1A and #1B See table below for end offices, tandems, and types of traffic (continued from page 1)

| CLLI Code | Name | Traffic Type |
|-------------|--|--|
| CHTGTNNS84T | BellSouth Toll Tandem (effective 9/3/03) | All BellSouth Pic'd Intralata and the following type calls for Interlata IXC and non-Bell Intralata IXCs are tandemed to BellSouth All BellSouth Pic'd Intralata calls Orig/Term Non-Pre queried 800 (which Bledsoe has) Operator Services TOPS/TSPS ISDN/SDN/Switched 56K County Wide EAS (these go over the EAS trunks to EAS tandem above) Metro EAS (these go over the EAS trunks to EAS tandem above) Local E-911 00 Dialed Operator |

(NOTE Prior to 09/03/03, all toll and EAS traffic went through the BellSouth tandems ONLY)

Question #4 Bledsoe Telephone Cooperative is an Average Schedule Company

Question #8 Yes, we have both "call forwarding" and "foreign exchange service"

Question #8a We do not place any restrictions on locations to which we provide "call forwarding" of "foreign exchange service"

Both services involve appropriate IXCs in the routing and billing of these services.

Question #8b There is no way to identify this percentage of traffic

Question #11A No, we depend on BellSouth's measurement and identification. We have no basis to measure this traffic

Question #11B No, we depend on BellSouth's measurement and identification. We have no basis to measure this traffic.

Question #11C Yes, we have billed two CLECs for termination of traffic indirectly delivered to ICO via BellSouth tandem

Question #11C a KMC Telecom and EPB (Electric Power Board) (they have refused to pay, saying the traffic is local)

Question #11C b KMC Telecom first billed 02/2001 and EPB first billed 02/2002

Question #11C c We received a reel or FTP file from BellSouth with this terminating access usage included by their CIC code

(KMC CIC #5703 and EPB CIC #5645)

Question #11C d We are not receiving Feature Group D traffic on trunks incoming from BellSouth. We are only receiving Feature Group C traffic for which we can not identify, measure, and bill unless we receive this information from the IC/SWC and/or BellSouth tandem

DeKalb Telephone Cooperative

Question 1:

- A. DeKalb Telephone Cooperative does not have it's own tandem. We are connected to the BellSouth tandem (NSVLTNMT84T). We also connect to the IRIS tandem (NSVNTNGN00T).
- B. The traffic being exchanged is Orig. & Term 1 Plus and 800 type traffic. Note: We converted an estimated 85% of our traffic to IRIS.

Question 4:

DeKalb Telephone is a cost company, not an average schedule.

Question 8:

- A. We have no geographic restrictions on the referenced services.
- B. We have not exact data regarding this, however, considering the amount of customers that subscribe to these services, we would estimate the traffic volume would be very low, probably less than 2% of all traffic volume.

Question 11:

- A. Part 1: No.
Part 2: We can on IXC's that originate traffic from our area.
- B. We can on originating traffic.
- C. Yes.
 - A. SPRINT PCS, ATT Wireless, Cingular Wireless, Verizon Wireless
 - B. SPRINT (9-20-2001) ATT Wireless (1-20-04), Cingular Wireless (2-20-03), Verizon Wireless (1-20-04)
- C. We have to manipulate the Carrier Field during a billing back office function. The records are not sent to us in a standard format, as BellSouth always states. That is the reason we can't identify it through the switch as the questions above suggest. BellSouth populates a field in the record with an ID that they relate to the CMRS provider. The carrier field, that our billing system recognizes, is populated with 0000, the BellSouth ID. In order for us to identify the traffic from the CMRS providers, we have to move the CMRS id over into the "normal" IXC field. This allows us to then produce a bill that has the CMRS traffic on it.
- D Yes. The feature group C trunks do not always have all the fields populated that is necessary to properly bill the traffic. On terminating records, most of the time the from number just has all 9's. I have spoken with CLEC's before and they tell me they send the info to BellSouth, but it "magically" gets translated to all 9's or some other irrelevant number sequence.

Loretto Telephone Company

QUESTION # 1 (A)

Prior to June, 2003, Loretto Telephone Company, Inc. was an AccessTandem, with direct trunks to all carriers. Therefore, the CMRS providers should have established direct trunks to Loretto. After the cut of our Interlata traffic to Iris Networks in June 2003, the Loretto central office became an Intralata and Local tandem.

The Loretto tandem does have a connection to the Bellsouth tandem in Nashville. The Bellsouth Tandem's CLLI code is NSVLTNMT84T. The Loretto tandem switches all Intralata traffic for our other exchanges.

The Loretto and Ethridge switches are also connected to the IRIS tandem in Nashville. The IRIS CLLI code is NSVLTNNGN00T.

1 (B) The traffic exchanged on the BellSouth trunk group is supposed to be intralata traffic between BellSouth and Loretto only. However, BellSouth terminates Intralata traffic, some IXC traffic, CLEC traffic, and wireless traffic into Loretto over this trunk group.

QUESTION # 4

Yes, Loretto Telephone Company is an average schedule company.

QUESTION # 8

YES, Loretto Telephone does offer both call forwarding and foreign exchange service to its customers.

8 (a) Loretto does not place any geographic restrictions on call forwarding calls made by its customers. In these circumstances, the party that does the call forwarding pays for the call.

Loretto only provides foreign exchange service (FXS) to customers on a private line basis. This is a point to point service only.

8 (b) The exact number of calls forwarded is not known, however we believe the total forwarded (local & long distance) is less than 1%.

Loretto has only 3 customers with foreign exchange service and this is on a point to point basis.

Question # 11 (A) Loretto does not have the capability to measure co-mingled traffic on the BellSouth trunk group. If the carrier sends his call as a FG D type call and someone does not strip off the CIC code, we can identify and measure this type of traffic.

11 (B) No, we cannot identify the traffic sent over this group if it is sent as a FG-C type call. We can identify IXC calls over this trunk group. If the wireless carriers and the CLEC's would get a CIC code assigned to them and not intentionally strip this information out of the call record, we could identify and measure these calls.

11 (C) We have not billed any CMRS or CLEC carrier for termination of traffic that was indirectly delivered to ICO via a BellSouth tandem.

However, we do know that wireless and CLEC traffic is riding this trunk group because we have made test calls from these services and traced these calls to see how they are being terminated into Loretto.

Millington Telephone Company

1A MTC end office: MGTNTNXADS0; BellSouth Tandem: MPH84TWAF102775

1B Traffic being exchanged: cellular, 1-8xx, intra-lata, CLEC, IXC with no direct trunks.

4 MTC is a COST company.

8 Yes we offer call forwarding and / or foreign exchange service.

8a MTC does not place any geographic restrictions

8b The percentage of traffic forwarded to a foreign exchange is unknown because we do not measure the traffic.

MTC has approximately 15 foreign exchanges customers.

11A MTC cannot identify or measure co-mingled traffic on a real time basis or any other basis.

11B MTC cannot identify or measure traffic over the trunk groups by non-CMRS providers.

11C MTC has not billed any CMRS or CLEC for termination of traffic that was delivered indirectly to MTC.

11D The BellSouth tandem serving MTC is Feature Group D, Feature Group C is not utilized. If Feature Group C were to be utilized, there would be not difference in our ability to measure and bill co-mingled terminating traffic.

North Central Telephone Cooperative Inc.

- 1 If any ICO has established its own tandem, or subtends a non-ICO tandem provider other than BellSouth, does any connection remain between a BellSouth tandem and the ICO's end office or tandem switch(es), or the non-ICO tandem to which ICO's network is also connected? If the answer is "Yes", please identify on an ICO-specific basis

Yes, North Central does have a connection to the BellSouth tandem

A. By CLLI Code, the connected BellSouth tandem, ICO end office or tandem switch(es), and any non-ICO tandem switch

| | Bell Tandem | Non ICO Tandem | ICO Tandem | End Office | Type |
|-----------|-------------|----------------|-------------|-------------|--|
| BellSouth | NSVLTNMT21W | | | LFYTTNXADS1 | Bell handles IntraLATA traffic |
| IRIS | | NSVLTNMT43T | | LFYTTNXADS1 | IRIS handles InterLATA traffic (IXC Traffic) |
| NCTC | | | LFYTTNXA01T | LFYTTNXADS1 | NCTC handles limited IXC Traffic |

B The type(s) of traffic being exchanged between the identified BellSouth tandem and the ICOs network

4. Please indicate whether each of the Rural Coalition companies is an "Average Schedule Company" for purposes of interstate access rates.

North Central Telephone Cooperative is a "Cost" company

8. Please identify whether ICO offers "call forwarding" and / or "foreign exchange service" to its customers and if, so

a Whether the ICO places any geographic restriction on the locations to which calls can be

forwarded and/or foreign exchange service established, and

The company provides call forwarding under tariff. Call forwarding can be activated to any location, toll charges may apply

Yes, the company offers foreign exchange service. The company restricts county wide calling plans, plans are not to be provided on fx lines in which the end user is outside the county

b What percentage of traffic received by the ICO is forwarded or sent to a foreign exchange

The company has never attempted to track this data

(North Central Telephone Cooperative, page 2/2)

11. On page 29 of Mr. Watkins' testimony, he contends that "when BellSouth commingles the third party traffic with other access traffic, the ICOs do not have technically feasible methods to identify measure, or switch, on a real-time basis, traffic based on whether the call has been originated by one of the CMRS providers." Please answer the following questions regarding this statement

A Do the ICOs have the ability to identify or measure co-mingled traffic on something other than a "real time basis" and if so what basis? Can the ICOs measure or identify traffic sent over those trunks groups by carriers other than the CMRS providers (e.g. BellSouth, CLECs, IXCs etc)?

Traffic could be measured by doing a study, however we can not determine the delivering provider based on our own switch records. OCN and or CIC information is not delivered to us. That information has been provided to us in separate recordings by BellSouth

B Can the ICOs measure or identify traffic sent over those trunks groups by carriers other than the CMRS providers (e.g. BellSouth, CLECs, IXCs etc)?

Traffic could be measured by doing a study, however we can not determine the delivering provider based on our own switch records. OCN and or CIC information is not delivered to us. That information has been provided to us in separate recordings by BellSouth

C Has any ICO ever billed any CMRS or CLEC carrier for termination of traffic that was indirectly delivered

to ICO via a BellSouth tandem?

NO

D. Is there a difference between the ICOs ability to identify, measure and bill traffic that is co-mingled over Feature Group C trunks and traffic that is co-mingled over Feature Group D trunks? If so please explain

If the traffic comes over FGD trunks and the CIC has been stripped then we cannot identify the traffic

United Telephone Co

1. Tandem arrangement - Yes
 - a. NSVLTNMT84T
 - b. Intralata, Local CLEC, Local Wireless
4. United Telephone is a Cost Company
8. United Telephone offers Call Forwarding and Foreign Exchange Services
 - a. United can call forward to any location, however if the forwarded call is out of area, long distance charges apply.
 - b. Less than 1% of traffic received by United is forwarded or sent to a foreign exchange.
11.
 - a. No. United Telephone does not currently have a feasible method to identify calls originated by one of the CMRS providers or the ability to identify or measure co-mingled traffic. United Telephone does not currently have a feasible method to identify calls originated by carriers other than the CMRS providers or the ability to identify or measure co-mingled traffic.
 - b. No. Looks like Bell traffic
 - c. Yes, CLEC traffic is being billed We are not currently billing the CMRS because Bell is sending it like feature group C Traffic and we do not have a feasible method to bill.
 - United bills CLEC traffic to Adelphia/Telcove-began billing in 1998, NewSouth-began billing in 2000, US Lec- began billing in 2001, Business Telecom-began billing in 2003, and NuVox-began billing in 2003
 - The volume of traffic we have billed the CLEC's are based on records provided by BellSouth.

Yorkville Telephone Cooperative

1. We only tandem with BellSouth.
4. Yorkville Telephone Cooperative is an average schedule company.
8. Yorkville Telephone Cooperative does offer call forwarding to our customers. No restrictions are placed geographically on these types of calls. To our knowledge, we have no calls being sent to a foreign exchange.

11 A.

11.B Not to our knowledge.

11.C Yes.

The CMRS Carriers that Yorkville Telephone Cooperative is currently billing Access for along with the date we started receiving usage are as follows:

OCN #6664 - SPRINT SPECTRUM, TN - usage started 04/23/2003

OCN #6219-BELLSOUTH TELECOMMUNICATIONS - usage started 04/23/2003

OCN #6673-VERIZON WIRELESS - usage started 05/22/2003

OCN #6010-AT&T WIRELESS - usage started 08/01/2003

TDS Telecom - (Concord Telephone Exchange, Inc., Humphreys County Telephone Company, Tennessee Telephone Company, Tellico)
Response to Supplemental Interrogatories of the CMRS Providers
July 6, 2004

1. The TDS Telecom companies do not subtend a tandem other than BellSouth.

1A N/A

1B N/A

4. Concord Telephone Exchange, Inc. is an average schedule company. Humphreys County Telephone Company, Tennessee Telephone Company, and Tellico Telephone Company are cost companies.

8. The TDS companies offer call forwarding and foreign exchange service.

8a The TDS companies do not obligate themselves to furnish such service generally, but will do so where facilities are available to permit satisfactory transmission. The only company with geographic restrictions is Concord Tel, which offers FX service within the state of Tennessee. No geographic restrictions are placed on call forwarding. However, all calls forwarded are subject to transmission limitations and all applicable local and long distance charges.

8b It is not technically feasible to determine the percentage of traffic forwarded by the companies.

11A. The TDS companies do not have the ability to measure terminating commingled traffic by carrier on a real time or any other basis.

11B See the response to 11A.

11C TDS has billed CMRS carriers for terminating indirect traffic.

11C(a) Following is a list of billed CMRS carriers: Verizon Wireless

11C(b) The TDS companies have billed Verizon Wireless for traffic terminating from June 2003 to the present. The agreement with Verizon has been canceled, but will remain in effect until replaced.

11C(c) The companies are dependent on the tandem company (BellSouth) to properly measure the traffic, and to identify the originating carrier in order to generate the appropriate billing.

**TDS Telecom - (Concord Telephone Exchange, Inc., Humphreys County Telephone
Company, Tennessee Telephone Company, Tellico)
Response to Supplemental Interrogatories of the CMRS Providers
July 6, 2004**

11C(d) The TDS companies are able to identify by carrier, traffic terminating over FGD trunks. This traffic cannot be identified when terminated over FGC trunks.

Answers to Questions 1, 4, 8 and 11
Crockett, Peoples and West Tennessee Telephone Companies
July 6, 2004

Q1.

- a. Peoples Telephone Company has a connection with the BellSouth tandem in Nashville, Tennessee.

ERINTNXADS2 NSVLTNMT86T

- b. Crockett Telephone Company has a connection with the BellSouth tandem in Memphis, Tennessee.

ALAMTNXADS1 MMPHTNMA84T

- c. West Tennessee Telephone Company has a connection with BellSouth tandem in Memphis, Tennessee.

BRFRTNXADS2 MMPHTNMA84T

Q4.

All three Tennessee companies were average schedule companies until January 2003.

West Tennessee is still an average schedule company for purposes of interstate access rates.

Peoples and Crockett Telephone Companies became cost companies on January 1, 2003.

Q8.

All three companies offer call forwarding to our customers, and they offer foreign exchange service as a jointly provided service with BellSouth.

Q11.

- a. Peoples, Crockett, and West Tennessee Telephone Companies do not have the ability to identify or measure traffic originated by a CMRS provider on a real-time basis, but in most cases BellSouth provides this in the EMR 11-01-01 record.
- b. Same as 11a above
- c. Peoples, Crockett, and West Tennessee Telephone Companies DO bill CMRS and CLEC carriers for termination of traffic that was indirectly

delivered via a BellSouth tandem based on the EMR 11-01-01 records received from BellSouth.

- d. The CMRS traffic is also billed to BellSouth (at the 3 cent rate). No CMRS carrier has paid for any CMRS traffic billed to them. We billed them to preserve our claim.